KRZYSZTOF IRENEUSZ PAWLAK
EMAIL@EUGENIX.ORG
+48 519-521-520

REPUBLIKA POLSKA
KATOWICE 40-014
MARIACKA 11/7

BERGEN **29-10-2025**

PETITION TO EU PARLIAMENT FOR LIMITATIONS OF PLASTIC AND PAPER TYPES USED IN CONSUMER PACKAGING

Introduction

1. We, the undersigned organisation and citizens represented by Eugenix® P.S.A., petition the European Parliament to adopt legislation requiring manufacturers of consumer goods and manufacturers of packaging to limit the number of plastic types and plastic colors used in standard containers and packaging, and to restrict the use of complex, hard-to-recycle paper composite packaging's. This legal obligation will simplify sorting and recycling streams, raise recycling yields, reduce contamination and environmental harm, and lower costs across the waste management chain.

Petition

1. Petition to the European Union to introduce an obligation for manufacturers of typical consumer products and manufacturers of packaging for consumed products to use a limited number of types and colors of plastics used for the production of all standard containers of articles and consumer products in order to protect the environment by limiting the diversity of plastics received by sorting and recycling companies, and by restricting the types of plastics allowed for use by companies, thereby reducing the complexity of sorting and recycling waste of artificial origin.

2. The number of permitted types and colors of plastics should be kept to a minimum, without limiting the size, shapes, or thickness of product and consumer goods packaging, to those types of plastics and color variations that meet the requirements of the food industry to which the plastics belong, specifically "Food Grade" plastics. Additionally, they should meet the requirements of the household

chemicals, cosmetics, and hygiene industries, ensuring that the produced packaging is safe concerning the hazardous properties of substances, including those containing melting or corrosive substances that can affect certain types of plastics. In case of necessity of consensus to two types of plastics that should be accepted as necessary measure.

3. The ideal solution would be to define, in a forum of manufacturers created by individual member states of the European Union with the assistance of the Ministry of the Environment, all types of plastics currently used for packaging articles and products, in order to identify plastics whose advantages can meet the requirements of all manufacturers, allowing their use for as many frequently and repeatedly purchased consumer goods and food products, cleaning products, hygiene products, and cosmetic products that are used by us repeatedly but purchased in small quantities due to variety, weight, necessity, and price.

4. In the same forum, packaging manufacturers and manufacturers of items packaged in a variety of plastics should also define which specific components, applied to packaging by consumer goods manufacturers and made of plastics, should be produced from the minimal types of plastics. These components include labels, stickers, caps, and even the dyes used for printing labels that allow for the contrasting display of all necessary product information such as name, composition, capacity, as well as colored elements that enable easy differentiation and quick identification of distinct products through colored labels that allow for marketing diversity.

5. Manufacturers of consumer products packaged in paper packaging should also be required to follow a forum that limits the types of permissible paper packaging, particularly paper packaging that is not easily recyclable due to the admixture of various plastic and aluminum substances in the paper packaging, which hinders the separation of paper from such substances, resulting in a large amount of paper waste during the recycling process of such packaging. All manufacturers of any consumer goods that have a UPC code should agree on the types of paper packaging allowed for use by producers, minimizing hard-to-recycle paper packaging such as Tetra-Pak and Paper-Foil used by manufacturers of juices, milk, creamers, beans, candies, and any other products available in every supermarket.

6. To initiate the adequate forum that allows to introduce such changes European Union or their individual states should conduct a survey among all producers of all UPC registered products to prepare forums that include producers of product that have the biggest by volume of plastic, sale of their plastic

package products in corresponding categories of products such as food items, household cleaning, household hygiene, household and cosmetics.

Background and problem statement

- Current market practice uses a wide diversity of polymer types, additives and printed colors in consumer packaging, which undermines mechanical and chemical recycling processes and increases contamination and residual waste. This diversity makes sorting more complex and less efficient for material recovery operators.
- Paper-based packaging that includes plastic and aluminum laminates (for example Tetra Pak–style composites and paper-foil laminates) is often not separated cleanly in recycling, producing high-quality losses and substantial residual waste streams.
- The result is greater environmental impact, higher operational costs for sorting and recycling, and reduced circularity for frequently purchased consumer goods such as food, hygiene, cleaning and cosmetic products.

Legal basis and objectives

- Request the European Parliament to introduce a harmonized obligation under EU product and packaging law that:
    - Limits permitted plastic polymer types and their use in standard consumer containers and packaging to a small, defined set of food-grade and industry-safe polymers;
    - Limits permitted coloring for those plastics to defined color ranges that do not impede optical sorting or recycling;
    - Restricts or phases out hard-to-recycle paper composite packaging unless producers can demonstrate a circular end-of-life route;
    - Establishes an EU-wide mechanism for identifying permitted materials and colors through structured, transparent stakeholder forums and technical assessments.
- Objectives: improve recycling performance, reduce contamination and residual waste, increase market uptake of recycled content, simplify producer compliance, and protect public and environmental health.

Proposed measures

1. **Mandatory material and color shortlist**
    a. Adopt a legally binding shortlist of permitted plastic polymer families for standard rigid and flexible containers (for example a limited set of well-characterized, food-grade-compatible polymers), and a permitted palette of colors optimized for optical sorting and recycling performance.
    b. Allow narrow, evidence-based exceptions limited to two polymer types per product category were justified by safety, chemical compatibility, or technical necessity.

2. **Harmonized rules for plastic components and print**
    a. Require that integral packaging components (caps, closures, labels, stickers, label adhesives, and label printing inks) be made from the permitted plastics or from readily separable materials, so they do not contaminate the packaging stream.
    b. Specify contrast and labelling rules to ensure product information remains legible while conforming to permitted color ranges.

3. **Paper packaging constraints**
    a. Prohibit or phase down the use of paper composites and laminates that cannot be separated and recycled at scale and require producers using such composites to demonstrate certified recycling pathways or substitution plans.
    b. Require UPC-registered product manufacturers to conform to harmonized allowable paper packaging types for product categories with high sales volumes.

4. **Stakeholder forum and technical assessment**
    a. Mandate national-level producer forums assisted by the Member State environment authorities to catalogue current packaging materials, evidence technical and safety requirements, and recommend the permitted list for EU adoption.
    b. Require these forums to include packaging manufacturers, brand owners (prioritizing high-volume UPC holders), recyclers, waste managers, consumer safety and food safety authorities, and independent technical experts.

5. **Survey and prioritization**

a. Require the Commission and Member States to mandate a survey of UPC-registered products to prioritize the product categories and manufacturers that produce the largest volume of problematic packaging, so the forum work is proportionate and impact-driven.

6. Implementation, timelines and enforcement

a. Phase-in period: adopt the shortlist and rules within 18 months of the legislative decision, with staggered compliance deadlines (e.g., 3–5 years) according to product category and technical complexity.
b. Conformity assessment: require manufacturers to declare compliance in product documentation and to include material declarations in the UPC/product information submitted to national registers.
c. Market surveillance and penalties: empower national market surveillance authorities to verify declarations and impose proportionate penalties for non-compliance; incentivize early compliance through extended producer responsibility credits and public procurement preference.

Exemptions and safety provisions

- Allow narrowly defined exemptions where alternative materials are demonstrably required for food safety, chemical compatibility (melting, corrosive substances), sterility or other essential performance reasons; exemptions must be time-limited and subject to independent review to drive substitution and innovation.
- Maintain consumer safety as paramount: all permitted polymers and inks must meet EU food contact and cosmetics/hygiene safety standards.

Monitoring, reporting and review

- Require annual public reporting by Member States and the Commission on:
  - Market uptake of permitted materials;
  - Recycling yields and contamination rates for the targeted packaging streams;
  - Progress on substitution of problematic paper composites; and

- Outcomes of national forums and any exemptions granted.

- Mandate a legislative review after five years to assess environmental outcomes and adjust permitted lists based on technological advances.

Benefits and expected impact

- Simplified sorting processes and higher yields for mechanical recycling technologies.
- Reduced contamination and lower residual waste to incineration and landfill.
- Improved availability of recycled feedstock for packaging manufacture.
- Greater transparency and easier compliance for producers, particularly SMEs.
- Clear, evidence-based pathway to phase out packaging types that undermine circularity.

Required actions by the European Parliament

- Instruct the Commission to prepare a legislative proposal amending relevant EU packaging, waste and product-safety legislation to:
  - Mandate the limitation of plastic polymer types and colors for standard packaging and packaging components;
  - Establish rules for paper composite packaging; and
  - Create the national forum mechanism, survey obligation and timeline described above.
- Ensure funding and technical support for Member States to run the national forums and for recyclers to scale sorting infrastructure where needed.

Closing Statements

7. We respectfully request the European Parliament to accept and advance this petition and to instruct the Commission to introduce the legislative measures described above to improve recycling, reduce environmental harm and accelerate the transition to a circular packaging economy With respect to the environment and regard to the consumers and producers.

K Pawlak

D.O.M. of the Piast & Wase
Founder and Board President of
Eugenix ® Simple Stock Corporation
Tribal and Indigenous Ethnic Minority of
Arcticus Blancus (Latin), Blanków (Polish).

Arctic Men Extinction Noticed.
Arctic Magnetic Earth Naturalist.
Antarctic Mass Excavation Nonetheless.